



STATE OF DELAWARE

**PUBLIC SERVICE COMMISSION**

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DOVER, DELAWARE 19904

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August 7, 2015

Ms. Carrie Baird-Forristall  
MidAmerican Energy Services, LLC  
4299 NW Urbandale Drive  
Urbandale, IA 50322

**Re: In The Matter of the Application of MidAmerican Energy Services, LLC For A Certificate to Provide Electric Supply Services within the State Of Delaware (Filed July 15, 2015) - PSC Docket No. 15-1122**

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Dear Ms. Baird-Forristall,

The Delaware Public Service Commission ("Commission") is in receipt of the (the "Application") by MidAmerican Energy Services, LLC ("Company") for certification to provide electric supply services in Delaware. In order to recommend approval of the Application, additional information is necessary as indicated below. Staff would appreciate a response by **September 4, 2015**, however, 26 *Del. Admin. C. § 3001* (the "Supplier Rules") section 2.4 provides that incomplete applications will be closed four months after the filing date, which would require a response prior to **November 16, 2015**. The responses and verifications can be uploaded as a subsequent filing in DelaFile under Docket No. 15-1122.

**Section 2.1.1.1 Authority to do Business in Delaware**

- Please provide a copy of the Delaware Business License

**Section 2.1.1.5.5 Relevant operational experience**

- Please provide a detailed professional resume for the principal officers responsible for Delaware operations

**Section 2.1.1.5.6 FERC approval as a marketer**

- As indicated in the submitted Application Staff will be looking for this documentation once it has been completed by the Applicant

#### Section 2.1.1.6 Verification of Application

- Please provide a signed, sworn verification letter, with any supplemental filings in support of the application (this should be by a principal or officer authorized to sign on behalf of the Applicant)

**Section 2.1.1.5.8** All new Applicants, except Brokers, shall demonstrate \$100,000 of assets in excess of encumbrances

- The Application indicates that stock equity will be used to satisfy this requirement, however on the 2014 financial statements submitted in support of the Application there is a balance of \$93,105 in stockholder's equity. This does not meet the threshold of \$100,000? Please provide further explanation of how this requirement is to be fulfilled.
- Further, there is a requirement in Section 2.1.1.5.9.3 of the Supplier Rules that states that the \$100,000 requirement can be satisfied by the use of **preferred stock** proceeds or other corporate shareholder equity, provided that the **use is restricted to maintenance of working capital for a period of at least twelve (12) months beyond certification of the Applicant by the Commission**. If stock proceeds are to be used to fulfill this requirement it will require a footnote on the balance sheet restricting access to those proceeds.

If the Applicant deems that Section 2.1.1.5.8 can't be satisfied with preferred stock another mechanism can be submitted to fulfill this section. Please refer to the Supplier Rules for further details, below is a link to the rules.

<http://regulations.delaware.gov/AdminCode/title26/3000/3001.pdf>

**Section 2.2** of the Supplier Rules provides as follows: **Each Applicant, except Brokers, shall publish notice of the filing of the application in two (2) newspapers having general circulation throughout the State of Delaware in a form to be prescribed by the Commission.** In anticipation of resolution of the issues above, the form of the notice is enclosed. The Company should publish, in two-column format outlined in black, the form of notice in the following newspapers: The News Journal and Delaware State News. The Company should file in this docket an affidavit from both newspapers attesting to the above publication. A 20-day comment period is required from the date of the publication for all interested parties to file comments and/or applications to intervene with the Commission. At the completion of the required notice period Staff will finalize the Company's Application for Commission approval if no comments and/or interventions have been received.

Ms. Carrie Baird-Forristall

August 7, 2015

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Should you have any questions or if I can be of any assistance you may contact me at (302) 736-7534 or by email at [toni.loper@state.de.us](mailto:toni.loper@state.de.us).

Respectfully,

A handwritten signature in black ink that reads "Toni Loper". The signature is written in a cursive, flowing style.

Toni Loper  
Public Utility Analyst II

Enclosures:     Public Notice

CC:     Ms. Donna Nickerson, Commission Secretary (w/o enclosures)  
         Ms. Malika Davis, Public Utility Analyst (w/o enclosures)